

EXHIBIT A

REVEREND RYAN AMAZEEN
December 08, 2021

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

VERY REVEREND GEORGES F.

DE LAIRE, J.C.L.,

Plaintiff,

vs.

Case No. 1:21-CV-00131-JD

GARY MICHAEL VORIS; ANITA CAREY;

ST. MICHAEL'S MEDIA a/k/a

CHURCH MILITANT,

Defendants.

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The Remote Deposition of REVEREND RYAN AMAZEEN,
Taken in Macomb County, Michigan,
Commencing at 1:57 p.m.,
Wednesday, December 8, 2021,
Before Laura T. Ambro, CSR-5882.

REVEREND RYAN AMAZEEN
December 08, 2021

<p style="text-align: right;">Page 18</p> <p>1 de Laire published by Church Militant?</p> <p>2 A. Yes.</p> <p>3 Q. And how long after the article -- the article was</p> <p>4 published on January 17th, 2019. Do you know how long</p> <p>5 after the publication you read it?</p> <p>6 A. I don't recall.</p> <p>7 Q. Did somebody tell you about the article before you read</p> <p>8 it, and then you went to go look at it, or did you just</p> <p>9 find it on your own?</p> <p>10 A. I don't recall.</p> <p>11 Q. Did you discuss it with anybody after reading it?</p> <p>12 A. Yes.</p> <p>13 Q. And who did you discuss it with?</p> <p>14 A. Seminarians.</p> <p>15 Q. Do you remember anyone in particular?</p> <p>16 A. Yes.</p> <p>17 Q. And who is that?</p> <p>18 A. Now Father Timothy Hynes.</p> <p>19 Q. H-e-i-n-z?</p> <p>20 A. H-y-n-e-s.</p> <p>21 Q. Not even close, okay. And what did you and Father</p> <p>22 Hynes discuss about the article?</p> <p>23 A. I don't recall specifically.</p> <p>24 Q. Do you remember -- did Father Hynes ask you any</p> <p>25 questions about Father de Laire? You know, whether you</p>	<p style="text-align: right;">Page 20</p> <p>1 in the article?</p> <p>2 A. No.</p> <p>3 Q. Did anyone ask you whether you could confirm any of the</p> <p>4 statements made in the article? For example, one of</p> <p>5 the statements that's at issue is that Father de Laire</p> <p>6 is not emotionally equipped to handle his jobs. Do you</p> <p>7 remember anyone asking you whether you believe that to</p> <p>8 be true?</p> <p>9 MS. ELOVECKY: Objection.</p> <p>10 A. Am I still to answer?</p> <p>11 MR. O'CONNELL: Yes.</p> <p>12 A. Not that I recall.</p> <p>13 BY MS. KLAUS:</p> <p>14 Q. Did anyone, during these discussions you had with the</p> <p>15 seminarians about the article, ask you questions about</p> <p>16 Father de Laire's character?</p> <p>17 A. Not that I recall.</p> <p>18 Q. Has anyone, at any time, told you that their opinion of</p> <p>19 Father de Laire's reputation was diminished because of</p> <p>20 the articles my client published?</p> <p>21 A. No.</p> <p>22 MS. KLAUS: I don't have any further</p> <p>23 questions, but Father de Laire's attorney may.</p> <p>24 MS. ELOVECKY: Yes, I have a few questions.</p> <p>25 EXAMINATION</p>
<p style="text-align: right;">Page 19</p> <p>1 knew him, anything like that?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. And what do you remember Father Hynes asking you</p> <p>4 specifically?</p> <p>5 A. If I knew Father de Laire.</p> <p>6 Q. And you said yes?</p> <p>7 A. Yes.</p> <p>8 Q. What else do you remember about that conversation with</p> <p>9 Father Hynes?</p> <p>10 A. I really don't recall anything else.</p> <p>11 Q. Did you tell Father de Laire that you had this</p> <p>12 conversation with Father Hynes?</p> <p>13 A. Yes.</p> <p>14 Q. And how soon after the conversation with Father Hynes</p> <p>15 did you report it to Father de Laire?</p> <p>16 A. I don't recall.</p> <p>17 Q. And do you remember what you told Father de Laire about</p> <p>18 the conversation with Father Hynes?</p> <p>19 A. Yes.</p> <p>20 Q. And what do you remember telling Father de Laire?</p> <p>21 A. That some seminarians were talking about the article.</p> <p>22 Q. Anything else?</p> <p>23 A. Not that I recall.</p> <p>24 Q. Did you remember anyone that you talked to about the</p> <p>25 article saying that they believed the statements made</p>	<p style="text-align: right;">Page 21</p> <p>1 BY MS. ELOVECKY:</p> <p>2 Q. Good afternoon, Father Amazeen. Thank you for your</p> <p>3 time.</p> <p>4 A. Thank you.</p> <p>5 Q. Father Amazeen, as of January of 2019, how well did you</p> <p>6 know Father de Laire?</p> <p>7 A. As of January 2019? I knew him very well. That's</p> <p>8 relative, but I know him, yeah.</p> <p>9 Q. And in January of 2019, were you in seminary?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. I'm going to share a document with you. So, I'm</p> <p>12 sharing with you the article that is dated January</p> <p>13 17th, 2019 that was published on churchmilitant.com.</p> <p>14 Do you see that?</p> <p>15 A. I do, yes.</p> <p>16 Q. And it's titled NH Vicar Changes Dogma Into Heresy. Do</p> <p>17 you see that?</p> <p>18 A. I do.</p> <p>19 Q. And there's a Bates stamp in the bottom right corner</p> <p>20 that says CM0042. Do you see that?</p> <p>21 A. Yes.</p> <p>22 Q. And is this the article that you testified previously</p> <p>23 that you read?</p> <p>24 A. Yes.</p> <p>25 Q. And do you know when you read this article?</p>